

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS

In Re:)	BK No.: 21-5193
)	
Ford City Condominium Association)	Chapter:11
Debtor)	Honorable Carol A. Doyle
)	Motion Date: June 17, 2021
)	Motion Time:10:00 a.m.

AMENDED NOTICE OF MOTION

To: Patrick S. Layng
United States Trustee
219 S. Dearborn, #873
Chicago, IL 60604
VIA CM/ECF

PLEASE TAKE NOTICE that on June 17, 2021, at 10:00 a.m., I will appear before the Honorable Carol A. Doyle, or any judge sitting in that judge's place, and present the Motion to Employ, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government.

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-8287666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **161 155 8289** and the password is **Doyle742**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ Shanita Q. T. Straw
Shanita Q. T. Straw

CERTIFICATE OF SERVICE

I, Shanita Q. T. Straw, an attorney, certify that I caused the foregoing Notice of Motion and Motion to Employ Counsel for the Debtor to be served upon the parties who receive notice via CM/ECF filing on June 14, 2021.

/s/ Shanita Q. T. Straw

Shanita Q. T. Straw

Shanita Q. T. Straw (ARDC #
6298398)
GOLDEN LAW
Attorneys for Debtor
6602 Roosevelt Road
Oak Park, Illinois 60304
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AMENDED MOTION TO EMPLOY COUNSEL FOR THE DEBTOR

Debtor, Ford City Condominium Association, ("Debtor"), move this Court for entry of an order approving the retention of Shanita Q. T. Straw and Daniel W. Diamond of GOLDEN LAW as counsel for the Debtor and respectfully represents to the Court as follows:

1. On April 20, 2021, Debtor filed a voluntary case under Chapter 11 of Title 11 of the United States Code ("Bankruptcy Code").
2. Debtor is a condominium association operating and existing under the laws of the State of Illinois as a not for profit corporation.
3. These proceedings have been filed under 11 U.S.C. Sub Chapter V of the United States Bankruptcy Code Section, accordingly, no creditor's committee has been appointed in this case.
4. William Avellone has been appointed the Sub Chapter V Trustee in this case.
5. The Debtor's operate as a condominium association whose primary business is to operate as a condominium association to collect assessments and pay expenses for common areas for the benefit of the association's unit owners and is currently managing its business as debtor-in-possession pursuant to section §1184 of the Bankruptcy Code.
6. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §157 and §1334. Venue is proper pursuant to 28 U.S.C. §§1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. §157(b).
7. Pursuant to 11 U.S.C. § 327(a) of the Bankruptcy Code, the Debtor, with Court approval, may employ attorneys, accountants, appraisers, auctioneers or other professional persons, all of whom must be disinterested.
8. The Debtor desires to retain the services of an attorney and request this Court to approve the retention of Shanita Q. T. Straw and Daniel W. Diamond of Golden Law counsel for the Debtor. A true and correct copy of the legal services agreement is attached hereto as Exhibit A.

9. The aforementioned attorneys and the law firm of Golden Law are not owed any money by the estate nor does it have any interest adverse to the interests of this estate or any class of creditors or equity security holders and is considered a disinterested person under the Bankruptcy Code and accordingly qualified to serve as counsel pursuant to Section 327 of the Bankruptcy Code.
10. The professional services to be rendered by the above named law firm can generally be described as follows:
 - a. To render legal advice with respect to the powers and duties of the Debtor;
 - b. To prepare all necessary pleadings, orders and reports with respect to this proceeding and to render all other legal services as may be necessary proper therein; and
 - c. to do the necessary legal work regarding approval of the disclosure statement and plan.
11. Section 327(a) of the Bankruptcy Code provides that, subject to Court approval, the compensation of any professional person may be on any reasonable terms and conditions including on a retainer, hourly basis or contingent fee arrangement. The Debtor believes that the above described counsel should be paid their normal hourly rate.
12. The attorneys of the law firm of Golden Law are experienced Chapter 7 and Chapter 13 bankruptcy counsel who also have a working knowledge of Chapter 11 and through their retention along with experienced Co-Counsel, the Debtor in Possession will be able to proceed expeditiously and effectively in this Court to the benefit of all parties in interest. *See In re Vittori*, 217 B.R. 242. In support of this motion, Debtor attaches hereto the affidavits of Shanita Q. T. Straw and Daniel W. Diamond.
13. Golden Law has associated Co-Counsel (Crane, Simon, Clar & Goodman) with Chapter 11 experience who has been approved by the Debtor and will file a Motion to Employ with this court.

WHEREFORE, Debtor, Ford City Condominium Association, pray that an order be entered that:

- A. They be authorized as of April 20, 2021 to employ Shanita Q. T. Straw and Daniel W. Diamond of the law firm Golden Law as Co-Counsel for the Debtor in the instant proceedings;
- B. This Court find the above-described counsel qualified to serve as Co-Counsel for the Debtor in Possession pursuant to Section 327 of the Bankruptcy Code and that said counsel are disinterested within the definition of that term under Section 101(13)(E)

of said Code; and

C. For such other and further relief as this Court deems just and proper.

FORD CITY CONDOMINIUM
ASSOCIATION,

/s/ Shanita Q. T. Straw

Shanita Q. T. Straw

One of its attorneys

Shanita Q. T. Straw (ARDC #
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